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October 5, 2020

Via ECF

Hon. Cheryl L. Pollak
United States District Court Judge
Eastern District of New York
United States Courthouse
225 Cadman Plaza E.
Brooklyn, NY 11201

Re: Motion to stay discovery

Case Name: SHEEHAN V. CONSENSYS, INC.

Case No. 19-cv-04154 (DLI)(CLP)

Dear Judge Pollak,

I represent the Plaintiff in the above referenced matter. In accordance with the Court's last Order, I am updating the Court concerning the status of my client and requesting a continued stay of discovery.

By way of background, in late July, I was notified by Plaintiff Sheehan's girlfriend that he went into cardiac arrest at his home. She managed to keep him alive by administering CPR, until paramedics arrived. The paramedics were able to sustain Mr. Sheehan until he was placed on life support when he arrived at the hospital. Mr. Sheehan was in a coma for some time, but he has been slowly improving.

Currently, Mr. Sheehan is in a rehabilitation facility. He has a long road to recovery ahead of him, but he is improving. Immediately after he came out of the coma, he was unable to see and speak. He could hear and had the limited ability to communicate through gesturing (e.g. thumbs up or down in response to commands). As of yesterday, he can speak, but it depends on his energy levels. Speaking takes a lot of energy from him. His vision has improved but is inconsistent. And his body is very weak; he must learn to walk again. On top of all the physical rehabilitation, he is in a tremendous amount of pain.

Accordingly, Mr. Sheehan cannot sit for a deposition or prosecute his claim at this time. If the Court would continue this open-ended stay of discovery, I will update the Court as Mr. Sheehan's status changes. The family suggested it will most likely be a three month period of time to see meaningful developments in his health.

I have discussed power of attorney with Mr. Sheehan's girlfriend, but the family would like to give Mr. Sheehan more time to heal to see if he will be able to make independent decisions concerning this case.

Thank you for your time and consideration of this request.

Respectfully Submitted,

By: Jordan El-Hag
Jordan El-Hag, Esq.